STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

December 11, 2002

CERTIFIED MAIL No. 7099 3220 0009 1975 6834

Jim Donaldson
Terminal Manager
Holcim (US) Inc.
350 Proctor Street
Bliss, ID 83314

RE: AIRS Facility No. 047-00013, Holcim (US) Inc., Bliss
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Donaldson:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 047-00013 for the Holcim (US) Inc. facility located in Bliss, in accordance with IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and all relevant comments received during the public comment period.

Stephen VanZandt of the Twin Falls Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Katherine B. Kelly
Administrator
Air Quality Division

KK/MJS/sm T2-020406 G:\Air Quality\Stationary Source\Ss Ltd\T2\Holcim\Final\T2-02044.Doc

Enclosure

cc: Laurie Kral, EPA Region 10
Stephen VanZandt, Twin Falls Regional Office
Paul Detterline, Senior Environmental Specialist, Holcim (US) Inc.

Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT NO. 047-00013

AQCR: 63 **CLASS:** SM

SIC: 4214 **ZONE:** 11

UTM COORDINATE (km): 667.7, 4754.8

1. PERMITTEE

Holcim (US) Inc.

2. PROJECT

Tier II operating permit and permit to construct modification - Portland Cement Transfer Facility - Bliss Terminal

3. MAILING ADDRESS	CITY	STATE	ZIP
6211 Ann Arbor Road	Dundee	MI	48103
4. FACILITY CONTACT	**TITLE**	**TELEPHONE**	
Jim Donaldson	Terminal Manager	(208) 352-4418	
5. RESPONSIBLE OFFICIAL	**TITLE**	**TELEPHONE**	
Looman Stingo	Vice President, Logistics	(734) 821-7092	
6. EXACT PLANT LOCATION		**COUNTY**	
350 Proctor St., Bliss, ID 83314		Gooding	

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Portland Cement Transfer Terminal

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 11, 2002

DATE EXPIRES: December 11, 2007

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PERMIT SCOPE

Purpose

1.1 This Tier II operating permit and permit to construct establishes facility-wide requirements to limit the facility's potential to emit below major source emission rates and to comply with ambient air quality standards in accordance with *Rules for the Control of Air Pollution in Idaho.*

Construction on the facility began in September 1987, and operation of the facility began in January 1988. Holcim (US) Inc. acquired the facility in April 1998. Neither the previous owner of the facility nor Holcim (US) Inc. obtained a PTC for the facility. This permit serves as a PTC to resolve the outstanding issue.

Regulated Sources

1.2 Table 1.1 provides a summary of the two sources of emissions regulated in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Sections	Source Description	Emissions Control(s)
3	Storage silo bin vent Material handling - railcar unloading into storage silos. Maximum unloading rate - 200 tons Portland cement per hour.	Baghouse filter: Manufacturer - DCL Maximum air flow - 600 acfm Stack diameter - 5.75 inches square Stack height - 77.5 feet Outlet loading - 0.05 gr/dscf
4	Truck loading Material handling - loading from storage silo to truck. Maximum unloading rate - 300 tons Portland cement per hour.	Baghouse filter: Manufacturer - Midwest Maximum air flow - 1,500 acfm Stack diameter - 7.5 inches Stack height - 33.7 feet Outlet loading - 0.05 gr/dscf

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[IDAPA 58.01.01.650-651, 5/1/94]

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.211.01, 5/1/94]

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.211.01, 5/1/94]

2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.211.01, 5/1/94]

Odors

2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.211.01, 5/1/94]

Visible Emissions

2.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NOx, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 5/1/94]

2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.211.01, 5/1/94]

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Open Burning

2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning.*

[IDAPA 58.01.01.600-616, 5/1/94]

Air Stagnation Advisory Days

2.11 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 - 562.

[IDAPA 58.01.01.550, 5/1/94]

Monitoring and Recordkeeping

2.12 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.211.01, 5/1/94]

Reports and Certifications

2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
601 Pole Line Road, Suite 2
Twin Falls, ID 83301
Phone: (208) 736-2190
Fax: (208) 736-2194

[IDAPA 58.01.01.123, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]

Obligation to Comply

2.14 Receiving this permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

[IDAPA 58.01.01.212, 5/1/94]

3. STORAGE SILO BIN VENT

3.1 Process Description

Holcim receives Portland cement via railcar. Portland cement is unloaded from the railcars into one of two storage silos using a collapsible boot to cover the railcar and an enclosed screw conveyor for material transfer.

3.2 Control Description

The collapsible boot and enclosed screw conveyor eliminate fugitive emissions while unloading Portland cement from the railcars. Dust is generated as the Portland cement is unloaded into the storage silos, and the dust is discharged to the atmosphere through a baghouse filter.

Table 3.1 STORAGE SILO BIN VENT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Storage silo bin vent/railcar unloading	Baghouse filter, EU-01	Storage silo bin vent, EU-01

Operating Requirements

3.3 Throughput Limits

The permittee shall limit the annual throughput of Portland cement unloaded from railcars to the storage silos to an amount not to exceed 700,000 tons per any consecutive 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94]

3.4 Baghouse Operating Requirements

The permittee shall operate and maintain the baghouse filter (EU-01) at all times that material is unloaded from railcars to the storage silos, and at all times material is stored in the storage silos.

The permittee shall maintain the pressure drop across the baghouse to levels within manufacturer and O&M manual specifications.

[IDAPA 58.01.01.211.01, 5/1/94]

3.5 Baghouse Operations and Maintenance Manual

The permittee shall develop an O&M manual within 90 days of issuance of this permit. The O&M manual is part of the terms and conditions of the permit. The manual shall address the operation, maintenance, and repair of the baghouse to ensure good working order and operation as efficiently as practicable.

The manual shall include, but shall not be limited to, the following: a general description of the control device, normal operating conditions and procedures, maintenance procedures, upset conditions and corrective procedures, methods of preventing malfunctions, appropriate corrective actions to be taken, provisions for routine inspections during regular operations, and provisions for inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Facility-wide Condition 2.12.

The O&M manual shall include a control device monitoring program that establishes operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and the frequency of recordkeeping. The control device monitoring program shall be developed by the permittee based on vendor data and other supporting documentation.

The O&M manual shall be maintained onsite and shall be made available to Department representatives upon request.

Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with IDAPA 58.01.01.130-136, if applicable.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements

3.6 Throughput Monitoring

Each month, the permittee shall monitor and record the amount of Portland cement unloaded from railcars to the storage silos for that month and for the most recent 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94]

3.7 Baghouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per month when material is being unloaded from railcars to a storage silo. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.12.

[IDAPA 58.01.01.211.01, 5/1/94]

4. TRUCK LOADING

4.1 Process Description

Holcim unloads Portland cement from the storage silos into trucks.

4.2 Control Description

Dust is generated as the Portland cement is unloaded from the storage silos into the trucks. Dust is collected using a 1,500-acfm exhaust fan, and the dust is discharged to the atmosphere through a baghouse filter.

Table 4.1 TRUCK LOADING

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Truck loading	Baghouse filter, EU-02	Baghouse filter stack, EU-02

Operating Requirements

4.3 Throughput Limits

The permittee shall limit the annual throughput of Portland cement unloaded from the storage silos to trucks to an amount not to exceed 700,000 tons per any consecutive 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94]

4.4 Baghouse Operating Requirements

The permittee shall operate and maintain the baghouse filter (EU-02) at all times that material is unloaded from the storage silos into trucks.

The permittee shall maintain the pressure drop across the baghouse to levels within manufacturer and O&M manual specifications.

[IDAPA 58.01.01.211.01, 5/1/94]

4.5 Baghouse Operations and Maintenance Manual

The permittee shall develop an O&M manual within 90 days of issuance of this permit. The O&M manual is part of the terms and conditions of the permit. The O&M manual shall address the operation, maintenance, and repair of the baghouse to ensure good working order and operation as efficiently as practicable.

The manual shall include, but shall not be limited to, the following: a general description of the control device, normal operating conditions and procedures, maintenance procedures, upset conditions and corrective procedures, methods of preventing malfunctions, appropriate corrective actions to be taken, provisions for routine inspections during regular operations, and provisions for inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Facility-wide Condition 2.12.

The O&M manual shall include a control device monitoring program that establishes operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and the frequency of recordkeeping. The control device monitoring program shall be developed by the permittee based on vendor data and other supporting documentation.

The O&M manual shall be maintained onsite and shall be made available to Department representatives upon request.

Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with IDAPA 58.01.01.130-136, if applicable.

[IDAPA 58.01.01.211.01, 5/1/94]

Monitoring and Recordkeeping Requirements

4.6 Throughput Monitoring

Each month, the permittee shall monitor and record the amount of Portland cement unloaded from the storage silos to trucks for that month and for the most recent 12-month period.

[IDAPA 58.01.01.211.01, 5/1/94]

4.7 Baghouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per month when material is being loaded from a storage silo to trucks. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.12.

[IDAPA 58.01.01.211.01, 5/1/94]

5. FACILITY-WIDE EMISSIONS INVENTORY

The emissions inventory table includes all potential emissions from all sources at the facility. This table is provided for informational purposes only.

Table 5.1 EMISSION INVENTORY BASED ON PTE

Holcim (US) Inc., Bliss Terminal Potential Emissions[a] – Hourly (lb/hr), and Annual (T/yr)						
Source Description	**PM**		**PM_{10}**		**Lead**	
	lb/hr	**T/yr**	**lb/hr**	**T/yr**	**lb/hr**	**T/yr**
Railcar unloading	0.26	1.13	0.26	1.13	2.2E-06	3.8E-06
Truck loading	0.64	2.82	0.64	2.82	5.4E-05	6.3E-05
Travel on unpaved roads	0.24	1.00	0.13	0.55	0	0
TOTAL	**1.1**	**5.0**	**1.0**	**4.5**	**5.6E-05**	**6.7E-05**

[a] As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

6. OTHER SOURCES

Table 6.1 identifies other air pollution-emitting activities at the facility.

Table 6.1 OTHER AIR POLLUTION SOURCES AT THE FACILITY

Source Description
Travel on unpaved roadways

7. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101 et seq.

2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.

3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:

   - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
   - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.

4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.

5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.

7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.

8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.